

Horsham District Council Habitats Regulations Assessment (HRA) Screening Matrix

The purpose of this HRA screening record is to assess the need for appropriate assessment in relation to the project detailed below.

The Conservation of Habitats and Species Regulations 2017 (as amended) requires that a Habitats Regulations Assessment screening is carried out in relation to any plan or project which is likely to have a significant effect on Habitats (European) sites, either alone or in combination with other plans or projects. Habitats sites are Special Protection Areas and Special Areas of Conservation. Ramsar sites should also be given the same level of protection, as stated within the National Planning Policy Framework.

In line with the Court judgement (CJEU *People Over Wind v Coillte Teoranta* C-323/17), mitigation measures cannot be taken into account when carrying out a screening assessment to decide whether a development is likely to result in significant effects on a Habitats site.

Where an Appropriate Assessment is carried out a project may only be authorised after having ascertained that it will not adversely affect the integrity of the site(s) concerned.

Table 1: HRA Screening matrix for water neutrality

Stage 1 HRA screening	
Brief description of the development project	Application reference: DC/26/0454
	Application address: Land South of Billingshurst Business Park (Phase 3) Hilland Road Billingshurst West Sussex
	Application description: Engineering operation to create attenuation basins and swale.
	Type of application: Full (minor)
	Planning officer: Daniel Holmes
Details of the development project	Proximity to Arun Valley SAC / SPA / Ramsar: Is the application site: A) Within the Sussex North Water Supply Zone (WSZ) YES B) Within the 5km Zone of Influence for functionally linked habitats for Arun Valley SPA / Ramsar site No. The site is not located within the 5km Zone of Influence for functionally linked habitats associated with the Arun Valley SPA/Ramsar site. C) Is the Arun Valley SAC / SPA / Ramsar potentially impacted by the development: Yes. As the site lies within the Sussex North Water Supply Zone, there is a potential pathway for likely significant effects on the Arun Valley SAC, SPA and Ramsar site through increased water abstraction. D) If YES to question (A) is the planning application directly connected with or necessary to the management of the a SAC/SPA/Ramsar site? No. The proposal is not directly connected with or necessary to the management of the Arun Valley SAC, SPA or Ramsar site.

Brief description of the Habitats sites within scope of this assessment	The following Habitats sites have been considered within this assessment: Arun Valley SAC / SPA / Ramsar The Arun Valley SAC, SPA and Ramsar Site are designated for important wetland habitats, invertebrates and bird populations. The site lies approximately 9.2km from these designations and no direct connection to the qualifying features has been identified. The Mens SAC The Mens SAC is designated for internationally important woodland habitat and populations of Barbastelle bats (<i>Barbastella barbastellus</i>). The application site falls within the identified Key Conservation Area associated with the SAC and therefore consideration must be given to potential impacts upon habitat connectivity, commuting routes and foraging habitat used by Barbastelle bats. Ebernoe Common SAC Ebernoe Common SAC is designated for internationally important woodland habitats and populations of Barbastelle and Bechstein's bats. The application site falls within the Wider Conservation Area associated with the SAC and therefore potential impacts upon habitat connectivity and supporting habitat require consideration.
Key vulnerabilities / factors affecting site integrity	Key vulnerabilities affecting site integrity include: • Habitat loss and fragmentation of supporting habitat. • Severance of commuting and foraging routes used by Barbastelle bats. • Changes in land management affecting habitat availability. • Disturbance arising from lighting. • Hydrological changes. • Air pollution. The Arun Valley SAC, SPA and Ramsar site has historically been subject to water neutrality considerations associated with water abstraction within the Sussex North Water Supply Zone. However, Natural England issued a Withdrawal Statement on 31 October 2025 in relation to its previous Position Statement and interim advice. Accordingly, water neutrality considerations are addressed separately by Horsham District Council under the Council's current approach and are not relied upon as part of this bat SAC screening assessment
HRA Screening Assessment Criteria	
The individual elements of the project (either alone or in combination with other plans or projects) likely to give rise to impacts on the Arun Valley SAC, SPA and Ramsar site	The proposal comprises the creation of attenuation basins and a swale together with associated landscaping. The development does not involve the removal of hedgerows, woodland or other significant linear habitat features and no external lighting is proposed. Existing trees are to be retained and protected. The proposal will not result in direct land take from any European site and does not lie on any identified Barbastelle bat flightline. There are no records of Barbastelle bats within 2km of the site. The ecology consultant advises that habitat connectivity across the site will be maintained and there would be no severance of foraging or commuting routes associated with the SACs. No impact pathways have been identified in relation to direct habitat loss, habitat fragmentation, hydrological change, woodland management, invasive species, air pollution or lighting disturbance.

	Accordingly, no likely significant effects have been identified either alone or in combination with other plans or projects.
Test 1 the significance test: – Can a judgement be made as to whether there could be any potential significant impacts of the development on the integrity of the Arun Valley SPA/ SAC/Ramsar.	Having considered the location, scale and nature of the proposal, the Local Planning Authority concludes that the development will not result in the loss of functionally linked habitat, severance of commuting routes, fragmentation of habitat networks or disturbance to qualifying species associated with The Mens SAC or Ebernoe Common SAC. Existing vegetation will be retained and habitat connectivity maintained. The proposal would not affect the qualifying features of the Arun Valley SAC, SPA or Ramsar Site and no impact pathways have been identified. The Local Planning Authority is therefore satisfied that it can conclude there would be no Likely Significant Effect (LSE) on any European site, either alone or in combination with other plans or projects. Conclusion: Can a judgement be made as to whether there could be any potentially significant impacts on the integrity of the Arun Valley SAC/SPA/Ramsar? Yes. Having undertaken this Habitats Regulations Assessment Screening, and having regard to the conservation objectives of The Mens SAC, Ebernoe Common SAC, Arun Valley SAC, Arun Valley SPA and Arun Valley Ramsar Site, Horsham District Council concludes that the proposal would not have a Likely Significant Effect on the designated features of any European site, either alone or in combination with other plans or projects. Accordingly, the proposal can be screened out at Stage 1 and there is no requirement to proceed to Appropriate Assessment under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended).

Approving Planner: Daniel Holmes

Date: 15.09.2026